

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES LIABILITY
INSURANCE CO., INC., AS INSURER OF
ADMINASERVICE, INC.,

Plaintiff,

v.

ADVANTIUS, INC., NEAL BERGSTROM,
ROBERT STEVENS, CHARLES CAMBRA
III, JONATHAN K. DRIGGS, AND
WORKFORCE SOLUTIONS, INC.,

Defendants.

Civil No. 0411824 PBS

**MOTION FOR LEAVE TO FILE REPLY BRIEF IN
RESPONSE TO PLAINTIFF’S OPPOSITION TO DEFENDANT’S
MOTION TO DISMISS AND ALTERNATIVE MOTION TO TRANSFER VENUE**

Appearing specially and without consenting to jurisdiction in this Court,
defendants Workforce Solutions, Inc., (“Workforce”), Charles Cambra III, and Jonathan
K. Driggs (collectively the “Workforce Defendants”) hereby moves that this Court grant
leave for the Workforce Defendants to file the attached reply brief in response to the
Plaintiff’s Opposition to Defendants’ Motion to Dismiss and Alternative Motion to
Transfer Venue.

As grounds for this motion, the Workforce Defendants state that the plaintiff's Opposition raises inaccurate arguments to which a response is required.

Respectfully submitted,

CHARLES CAMBRA III, JONATHAN K.
DRIGGS, AND WORKFORCE
SOLUTIONS, INC.

By their attorneys,

DATED: January 24, 2005

/s/ P. Andy Henderson
Edward V. Colbert, III (BBO # 566187)
P. Andy Henderson, Jr. (BBO # 655891)
LOONEY & GROSSMAN LLP
101 Arch Street
Boston, Massachusetts 02110-1112
(617) 951-2800

Erik A. Olson
DURHAM JONES & PINEGAR, P.C.
111 East Broadway, Suite 900
Salt Lake City, Utah 84111
(801) 415-3000

CERTIFICATE OF SERVICE

I, P. Andy Henderson, Jr. hereby certify that on January 24, 2005, I served a true copy of the foregoing pleading upon all parties hereto properly addressed to:

**Ellen Rappaport Tanowitz
Fitzhugh, Parker & Alvaro LLP
155 Federal Street
Suite 1700
Boston, MA 02110-1727**

/s/ Edward Colbert
Edward V. Colbert, III